UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

CHRISTINA MAYBERRY, *individually, and on behalf of others similarly situated,*	)	
Plaintiff,	)	
v.	)	Case No. 4:15-CV-1680-CEJ
SSM HEALTH BUSINESSES, d/b/a SSM HOME CARE and/or SSM HEALTH AT HOME,	)	
Defendant.	)	

DEFENDANT'S MOTION FOR LEAVE TO FILE ITS OPPOSITION TO PLAINTIFFS' MOTION FOR CONDITIONAL CERTIFICATION IN EXCESS OF PAGE LIMITATION AND UNDER SEAL

COMES NOW Defendant, by and through counsel and pursuant to E.D. Mo. Local Rule 13.05(A) and 7-4.01(d), and respectfully moves this Court for leave to file its Opposition to Plaintiffs' Motion for Conditional Certification under seal and over the page limitation. In support of this Motion, Defendant states as follows:

1. Pursuant to the Court's local rule, the page limitation for Defendant's Opposition to Plaintiffs' Motion for Conditional Certification and Memorandum in Support, which is due to be filed on October 26, 2016, is 15 pages.

2. Due to the breadth and extent of Defendant's evidence and related authority in opposition to collective certification and to permit Defendant the opportunity to fully respond to Plaintiffs' 29-page Motion for Conditional Certification (Plaintiffs were granted the same relief requested herein in connection with Plaintiffs' Motion, ECF Doc. No. 43), Defendant is in need of more than 15 pages to fully present the facts and legal arguments supporting Defendant's Opposition to Plaintiff's Motion for Conditional Certification.

3. In addition, Defendant's Opposition to Plaintiffs' Motion for Conditional Certification and Memorandum in Support, similar to Plaintiffs' Motion, contains references to, and quotes from, documents marked as "Confidential" pursuant to the Protective Order entered by this Court on March 22, 2016. (ECF Doc. No. 21). Likewise, the exhibits to Defendant's Opposition contain documents marked as "Confidential" pursuant to the Protective Order.

4. Pursuant to the Protective Order, the parties are to file under seal any pleading that contains or attaches "Confidential Information."

5. As such, Defendant respectfully requests that this Court grant this Motion and issue an Order permitting Defendant to file its Opposition to Plaintiffs' Combined Motion for Conditional Certification and Memorandum in Support, under seal and in excess of the 15-page limitation set forth in the local rule.

WHEREFORE, Defendant respectfully request that the Court grant this Motion and the relief requested herein.

Respectfully submitted,

GREENSFELDER, HEMKER & GALE, PC

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CERTIFICATE OF SERVICE

The foregoing was served on all parties of record via the Court's ECF System on October 25, 2016.

/s/ *Molly R. Batsch*